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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$24,100.00 IN
U.S. CURRENCY,

15 Defendant.
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STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

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18 It is hereby stipulated by and between the United States of America and potential claimant Tyrone
19 Roscoe (“claimant”), by and through their respective counsel, and Adriana Jones (“claimant”), appearing
20 *in propria persona*, as follows:

21 1. On or about November 29, 2023, claimant Tyrone Roscoe filed a claim in the
22 administrative forfeiture proceeding with the Drug Enforcement Administration with respect to the
23 Approximately \$24,100.00 in U.S. Currency (hereafter “defendant currency”), which was seized on
24 September 27, 2023. On or about December 29, 2023, claimant Adriana Jones filed a claim in the
25 administrative forfeiture proceeding with the Drug Enforcement Administration with respect to the
26 defendant currency.

27 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit
28 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any

1 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other
2 than claimants has filed a claim to the defendant currency as required by law in the administrative
3 forfeiture proceeding.

4 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
5 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
6 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
7 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
8 parties. That deadline is February 27, 2024.

9 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to April
10 26, 2024, the time in which the United States is required to file a civil complaint for forfeiture against the
11 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
12 forfeiture.

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5. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture shall be extended to April 26, 2024.

Dated: 2/26/2024

PHILLIP A. TALBERT
United States Attorney

By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

Dated: 2/20/2024

/s/ Isaac Safier
ISAAC SAFIER
Attorney for potential claimant
Tyrone Roscoe

(Signature authorized by email)

Dated: 2/22/2024

/s/ Adriana Jones
ADRIANA JONES
Potential Claimant, appearing *in propria persona*
28 Bridgeside Blvd.
Mount Pleasant, SC 29464

(Signature retained by attorney)

IT IS SO ORDERED.

Dated: _____

United States District Judge